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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYLON THIJAY RANDLE,

Defendant.

CASE NO. 1:21-cr-00246-ADA-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

Date: August 7, 2023
Time: 08:30 a.m.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a change of plea hearing on July 10, 2023.

2. By this stipulation, the parties move to continue the change of plea hearing until August 7, 2023, and to exclude time from calculation under the Speedy Trial Act between July 10, 2023, and August 7, 2023.

3. The parties agree and stipulate, and request that the Court find the following:

a) Initial discovery was provided to defendant on or about October 18, 2021, consisting of reports of investigation, body worn camera recordings, photographs, certified conviction records and a summary of defendant's criminal history.

1 b) Counsel for defendant desires additional time to review discovery, consult with
2 her client, conduct investigation and research related to the charges, and to engage in plea
3 negotiations.

4 c) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny her the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of July 10, 2023 to August 7, 2023,
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results
13 from a continuance granted by the Court request on the basis of the Court's finding that the ends
14 of justice served by taking such action outweigh the best interest of the public and the defendant
15 in a speedy trial.

16 **[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK]**

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 5, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ KIMBERLY A. SANCHEZ
KIMBERLY A. SANCHEZ
Assistant United States Attorney

Dated: July 5, 2023

/s/ CHRISTINA M. CORCORAN
CHRISTINA M. CORCORAN
Counsel for Defendant
RAYLON THIJAY RANDLE

IT IS SO ORDERED.

Dated: July 7, 2023


UNITED STATES DISTRICT JUDGE